

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SANDRA HOLDING LTD.,

Petitioner,

v.

Case No.

18-GJ1406-PBS

FAWZI MUSAED AL SALEH, AHMAD
FAWZI AL SALEH, QUABBIN CAPITAL
INC., AND JOHN I. SNOW III,

Respondents.

[PROPOSED] ORDER REGARDING APPLICATION FOR LEAVE TO
CONDUCT DISCOVERY PURSUANT TO 28 U.S.C. § 1782

Sandra Holding Ltd. ("Sandra Holding") submitted an Application for Order Granting Leave to Conduct Discovery for Use in Proceeding in Foreign Tribunal Pursuant to 28 U.S.C. § 1782 (the "Application") on September 25, 2018. By its Application, Sandra Holding seeks to obtain discovery from Fawzi Musaed Al Saleh, Ahmad Fawzi Al Saleh, Quabbin Capital Inc., and John I. Snow III. (collectively, the "Respondents") for use in a foreign proceeding that Sandra Holding reasonably contemplates initiating before the Grand Court of the Cayman Islands, Financial Services Division (the "Grand Court") against Universal Enterprises Ltd. ("Universal" or the "Company"), a Cayman Island company, and its director, Fawzi Musaed Al Saleh ("Fawzi").

The Court has considered the evidence, arguments, and law presented, and sufficient reason appearing, the Court rules as follows. It is hereby:

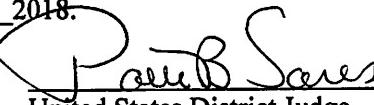
ORDERED that Sandra Holding shall serve the Respondents with copies of the: (1) Application and supporting Memorandum of Law; (2) Declaration of Nuri Musaed Al Saleh; (3) Declaration of Ulrich Payne; (4) Affidavit of Thomas M. Ciampa; and (5) this Order;

ORDERED that any opposition to the Application (including any objections to the proposed subpoenas attached to the Affidavit of Thomas M. Ciampa as Exhibits 1-4) shall be filed with the Court and served upon Sandra Holding within fourteen (14) days after service of the Application and supporting papers upon such opposing party;

ORDERED that a reply memorandum in support of the Application (and proposed subpoenas), if any, shall be filed with the Court and served upon any party that has filed and served an opposition at least two (2) business days before the show cause hearing described below; and

ORDERED that Respondents show cause before this Court at a hearing on TBD, 2018 at ___:___ am/pm, why an order should not be issued granting the Application.

SO ORDERED, this 31 day of September 2018.


United States District Judge